

### **REMARKS/ARGUMENTS**

Claims 1-9 are pending herein, claim 1 being independent. By the amendment above, claims 3 and 6 have been cancelled and re-presented in independent form as new claims 10 and 11, respectively. Claims 8 and 9 have been amended to change their dependency to depend from new independent claim 11 rather than former dependent claim 6. Claim 2 has been amended to clarify the positioning of the edge. It is believed that these amendments are cosmetic only. No new matter has been added.

In the pending Office Action, the Examiner rejected claims 1 and 2 under 35 U.S.C. § 102(b), as allegedly anticipated by United States Patent No. 5,793,618 (Chan, *et al.*); and rejected claim 4 under 35 U.S.C. § 103(a) as allegedly obvious over Chan, *et al.* The Examiner objected to claims 3 and 5-9 as depending from a rejected base claim, but indicated that those claims would be allowable if re-written in independent form, including all of the limitations of any intervening claims. By the amendment above, claims 3 and 6 have been cancelled and re-presented in independent form as new claims 10 and 11, respectively. Claims 8 and 9 have been amended to depend from new independent claim 11, rather than former dependent claim 6. Thus, it is respectfully submitted that claims 8-11 are allowable in light of the Examiner's comments in the pending Office Action. Claims 5 and 7 are believed to be allowable, as well, since they depend from claim 1, which is believed to be allowable (as will be discussed, *infra*).

As to the rejections of claims 1, 2 and 4, applicants respectfully traverse the Examiner's rejections, and submit that those claims are patentably distinct from Chan, *et al.*

The invention is directed to a pressure piece for effecting pressure contact within a power semiconductor module. The module includes leads for connecting the module to a printed circuit board. The pressure piece is dimensionally stable, and includes a plurality of pressure elements

which are disposed on a primary face of the pressure piece facing the printed circuit board, and which space the primary face from the printed circuit board. This construction is neither taught nor suggested by Chan, *et al.*

Chan, *et al.* disclose a module mounting assembly which comprises a series of generally planar objects, including a circuit board 20 and a guide member 64, which is spaced from the circuit board 20 by two intermediate layers: an interposer 32 and a locator assembly 36, neither of which exerts pressure on circuit board 20 or forms a part of guide member 64. The various layers of the assembly are held in place by a plurality of pins 108. In the Office Action, the Examiner has characterized guide member 64 of Chan, *et al.* as being the claimed pressure piece, but this is not an accurate characterization. Chan, *et al.* lack a pressure piece as claimed.

In the first instance, guide member 64 exerts no pressure on anything. It is a passive piece on which pressure is exerted by other elements of the structure of Chan, *et al.*, such as clamping members 41, 41a. It lacks any elements for exerting pressure on circuit board 20, and also fails to space the face of guide member 64 which faces circuit board 20 from guide member 64. Guide member 64 is flat, and lacks any element which may be construed as performing the claimed spacing function of the claimed pressure elements, or any other element which may exert pressure on anything (*see*, Chan, *et al.* col. 4, lines 18-27 for a discussion of the function performed by guide member 64). Thus, the assembly of Chan, *et al.* fails to meet the claim limitations of claim 1 and cannot anticipate that claim.

Furthermore, Chan, *et al.* do not render obvious the invention as claimed, since it is antithetical to the assembly of Chan, *et al.* to require any sort of pressure elements on the face of one of the layers. The assembly is held in place by exterior clamping members 41 and 41a (*see*, col. 3, line 56 - col. 4, line 6). In the absence of this exteriorly applied force, “there is a very loose fit of all

of the components” (col. 4, line 52). Additionally, there is no teaching or suggestion of the spacing function, since the various members are flat, and clearly form a layered assembly when assembled (*see*, Fig. 3).

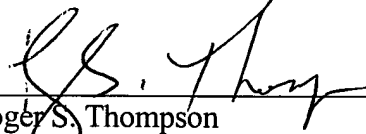
Thus, Chan, *et al.* fail to teach or suggest the invention as claimed.

There being no further grounds for objection or rejection, early and favorable action is respectfully solicited.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

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